

REMARKS

Applicants respectfully request consideration of the subject application as amended herein. This Amendment is submitted in response to the Office Action mailed November 21, 2005. Claims 1-31 stand rejected. In this Amendment, Claims 1-3, 5-8, 11-13, 17-19 and 22-29 have been amended. Claims 9, 10, 14-16, 30 and 31 have been canceled without prejudice. New claims 32 and 33 have been added. No new matter has been added.

The Examiner rejected claims 1-4, 6-9, 11-14, 16-20, 22-25, 27-31 under 35 U.S.C. 102(e) as being anticipated by Williams, (U.S. Patent No. 6,591,272, hereinafter "Williams"). Claims 5, 10, 15, 21 and 26 were rejected under 35 U.S.C. 103(a) as being unpatentable over Williams in view of Cseri, et al., (U.S. Patent No. 6,708,164, hereinafter "Cseri"). As discussed below, the pending claims are patentable over the above reference.

Williams describes operations related to a database and networked objects. Williams describes "a method of communication of changes to existing objects from client computers and their conversion into updates to one or more rows so as to modify the rows of the appropriate tables in the corresponding databases in transactional mode" (Col. 5, lines 34-38, Williams).

However, Williams does not teach or suggest receiving input data including a hierarchy of instances of object components, and performing a database modification process in response to this input data, where the database modification process first handles a higher-level component instance within the hierarchy and then proceeds to lower-level component instances within the hierarchy, as does the presently claimed invention. Accordingly, Williams lacks all pertinent features of the present invention that are included in the following language of claim 1:

... receiving input data including a hierarchy of instances of object components;

and
performing a database modification process in response to the input data, the
database modification process comprising
 finding a database record matching a higher-level component instance
 within the hierarchy,
 updating the matching database record based on the higher-level
 component instance,
 finding a set of child database records associated with the higher-level
 component instance,
 updating the set of child database records based on a first set of lower-level
 component instances within the hierarchy, each instance in the first set of lower-
 level component instances having a matching record in the set of child database
 records, and
 inserting new database records based on a second set of lower-level
 component instances, the instances in the second set of lower-level component
 instances not having matching records in the set of child database records.

Similar language is included in claims 17 and 22. Accordingly, the present invention
as claimed in claims 1, 17 and 22, and their corresponding dependent claims, is not
anticipated by Williams.

Cseri does not help Williams to render the presently claimed invention unpatentable.
Cseri discloses a mechanism for transforming the results of a query into a hierarchical
information stream. Similarly to Williams, Cseri does not teach or suggest receiving input
data including a hierarchy of instances of object components, and performing a database
modification process in response to this input data, where the database modification process
first handles a higher-level component instance within the hierarchy and then proceeds to
lower-level component instances within the hierarchy, as does the presently claimed
invention. Hence, Cseri lacks the same features of the presently claimed invention that are
missing from Williams. Accordingly, the present invention as claimed in claims 1, 17 and
22, and their corresponding dependent claims, is patentable over the combination of Williams
and Cseri.

With respect to claim 6, neither Williams nor Cseri teach or suggest receiving input
data including an external hierarchy of instances of object components, and performing a

modification process for a local group of instances of object components in response to this input data, where the modification process first handles a higher-level external instance within the external hierarchy and then proceeds to lower-level external instances within the external hierarchy, as does the presently claimed invention. Accordingly, the combination of Williams and Cseri lacks all pertinent features of the present invention that are included in the following language of claim 6:

... receiving input data including an external hierarchy of instances of object components; and
performing a modification process for a local group of instances of object components in response to the input data, the modification process comprising
finding, in the local group, a local instance matching a higher-level external instance within the external hierarchy,
updating the local instance based on the higher-level external instance,
finding a set of child local instances associated with the higher-level external instance,
updating the set of child local instances based on a first set of lower-level external instances within the external hierarchy, the external instances in the first set having matching child local instances, and
inserting new local instances into the local group based on a second set of lower-level external instances, the external instances in the second set not having matching local instances in the set of child local instances.

Similar language is included in claim 11. Accordingly, the present invention as claimed in claims 6 and 11, and their corresponding dependent claims, is patentable over the combination of Williams and Cseri.

Applicant respectfully requests the withdrawal of the claim rejections under 35 U.S.C. 102 (e) and 103 (a), and submits that the pending claims are in condition for allowance.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby


requests such extension.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Marina Portnova at (408) 720-8300.

Respectfully submitted,

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